

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

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In the Matter of )  
Provision of Improved )  
Telecommunications Services and )  
Speech-to-Speech Services for )  
Individuals with Hearing and )  
Speech Disabilities )

CC Docket No. 98-67

**COMMENTS OF STATE TRS ADMINISTRATORS WHO ARE INVOLVED  
WITH CAPTEL RELAY TRIALS**

On behalf of the State TRS Administrators of the States of Wisconsin, Maryland, Virginia and Washington, information is provided regarding the Petition for Clarification Provision and Cost Recovery for CapTel, an enhanced VCO service, filed by Ultratec, Inc. on April 12, 2002 (Petition). Specifically, as State TRS Administrators representing State Relay Programs participating in CapTel trials, we are providing information to support a NECA funding mechanism for both TRS interstate and intrastate, local and toll calls using any enhanced VCO with voice-recognition technology, including CapTel calls, for a three-year period.

We are currently conducting trials of CapTel enhanced VCO service, in hopes of bringing TRS one step closer to providing a more functionally equivalent and natural way for persons with a hearing disability and usable speech to use relay services. Beginning and ending dates of these state trials are:

- Wisconsin                      October 1, 2001 through March 31, 2003
- Maryland                        March 5, 2002 through June 4, 2003

- Virginia July 1, 2002 through November 30, 2003
- Washington September 1, 2002 through August 2003

Trial participants have overwhelmingly indicated that CapTel improves the level of relay customer satisfaction and offers more effective, complete, and more realistic, real-time communication for both parties on this new type of relay call. We believe these improvements are a direct result of five basic functions of CapTel:

- Ease of Calling
- More natural call flow
- Reduced length of relay call
- Improved accuracy of text
- Transparency of CapTel operator

Utilizing voice recognition software and an International Telephone Union (ITU) protocol to produce and transmit text, CapTel captions appear almost simultaneously with the spoken word. Ultratec reports an average word per minute rate in excess of 145<sup>1</sup>. Even the best relay centers average a CA typing speed of just over 80 words per minute<sup>2</sup>; many are lower. The result is a reduction in overall call length, yielding a call that is appreciably shorter than traditional relay and more similar to a non-relay call. Preliminary trial results indicate an average of a 41%<sup>3</sup> reduction in session minutes when compared to a standard relay call.

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<sup>1</sup> Average WPM based on monthly Ultratec reports for state trials, July – December 2002

<sup>2</sup> Average WPM based on independent testing by selected NASRA states, calendar year 2002.

<sup>3</sup> Average CAPTEL session minutes compared to average of standard relay session minutes, as reported by states currently participating in CapTel trials.

One of the basic components of the CapTel call is voice recognition software, which significantly increases the accuracy of transmitted text when compared to a traditional “typed” relay call. Informal testing conducted during various state trials indicates almost no omission of spoken words. Trial participants report that corrections are rare and handled by the CapTel Operator in real-time. Ultratec reports an accuracy rate in excess of 98%<sup>4</sup> compared to the nation’s best relay centers’ average accuracy rate of just over 90%<sup>5</sup>.

A significant result of the CapTel trials has been the anecdotal feedback from hearing participants in a CapTel call. The hearing participant often does not realize they have received a “relay” call because the operator does not announce the call and there is no perceived delay for typing or transmission of text. The transparency of the CapTel operator and the ability of both parties to “talk over” each other in an equivalent manner to a standard non-relay call, results in a more natural experience for the hearing party. Reports of hang-ups and frustrations over relay call “lag time” and “turn taking” are nominal. The use of Dial Through® eliminates the need for a relay access number for the CapTel phone user; the CapTel phone user dials only the number of the person being called and the connection to the captioning service occurs automatically.

The technologies utilized by CapTel offer people with a hearing disability an opportunity to access the telephone network in a manner more functionally equivalent to that of a hearing caller. CapTel also appears to be a more attractive option for the thousands of people with significant hearing loss who are currently reluctant to use traditional relay services. This population includes the 35 million people over the age of 65. It is estimated that within this demographic group, one in three has some degree of hearing loss.

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<sup>4</sup> Average rate of accuracy based on monthly Ultratec reports for state trials, July –December 2002.

<sup>5</sup> Average rate of accuracy based on independent testing by selected NASRA states, calendar year 2002.

While the various state trials have enjoyed great success and customer acceptance, it is not our intention to endorse a particular product/service such as CapTel. We are supporting the unique development of innovative telecommunications relay service technologies available that have great potential to bring us one step closer to a more functionally equivalent and natural way for person with a hearing disability to use relay services. However, for the purpose of addressing the potential development of new technology as encouraged by FCC, there are still several challenges that need to be addressed and resolved before the FCC should consider inclusion of any enhanced VCO with voice-recognition technology, including CapTel functionality, as part of a mandatory features requirement for TRS. They include:

- Availability of the service, 24 hours/day, 365 days/year.
- Access and connection to local PSAPs and 9-1-1 centers.
- Three Digit Access to enhanced VCO with voice-recognition technology TRS (7-1-1).
- Establishment of call patterns is essential to a determination of more accurate projections of future call volume.
- Permanent reimbursement for interstate and toll-free enhanced VCO with voice-recognition technology TRS calls.
- Provision of any future enhanced VCO with voice-recognition technology to all states through current relay providers.
- Provision of the opportunity to create a more level playing field for other vendor(s) in providing an enhanced VCO with voice-recognition technology TRS provider(s) to their customers.

Based on the initial success of our CapTel trials, the overwhelmingly positive response from trialists, and our perceived need for further development before the service should be considered as a requirement for TRS, we believe it would be beneficial for the FCC to encourage all states to offer or continue these trials.

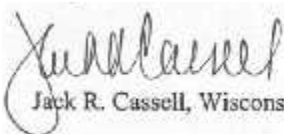
As representatives of state TRS programs currently participating in CapTel trials, we recommend your consideration of a TRS funding mechanism for both interstate and intrastate toll and local calls using any enhanced VCO with voice-recognition technology TRS, including CapTel calls, for a three-year period. This evaluation will provide information that may provide the impetus for further development by the industry towards technologies capable of improving the speed and accuracy of CA performance while minimizing CA ergonomic injuries. In short, it would revolutionize the basic operations of relay services in ways now barely contemplated. We believe that the potential of any future enhanced VCO with voice-recognition technology for TRS providers, and CapTel technology in particular, cannot be fully realized unless the FCC supports all industry efforts at this early stage through a TRS funding mechanism for both local and toll calls.

Recently, the Commission has fostered the development of innovative telecommunications relay service technologies through its support of reimbursement for Video Relay Service (VRS) and Internet Relay Service (IP Relay). These unique telecommunication relay service technologies are moving people whose primary communication mode is sign language one step closer to functional equivalency with the rest of the population.

We recommend that the Commission continue in this direction by encouraging the development of innovative, valuable features and products that allow opportunity for true

functional equivalency, which is currently more meaningful than the jurisdictional separation of its associated costs traditionally dealt with through NECA. Our collective experiences over the trial periods in our respective States, demonstrate that CapTel is much more than an enhanced VCO service. We believe your demonstrated support for enhanced VCO with voice-recognition TRS technology including CapTel will not only move a new population of relay users towards true functional equivalency, but may also improve the future of all text relay calls.

Respectfully submitted,



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*(Please see "Clayton's Statement of Verification" attachment)*

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*(Please see "Robert's Statement of Verification" attachment)*

## Statement of Verification

I have read the foregoing, and to the best of my knowledge, information, and belief, there is good ground to support it, and it is not interposed for delay. I verify under penalty of perjury that the foregoing is true and correct.

March 3, 2003



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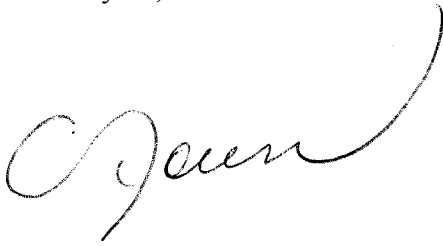
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February 14, 2003



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